

18 through capability that maybe are not present with RMI?

19 A. No, I am not anticipating that there are

20 problems with it, but I am not anticipating that it's

21 going to come in, be turned up, and work perfectly, until

22 I see some evidence that everybody in the industry is

23 aligned and we are moving forward. And we are not there

24 yet.

25 Q. So as far as it's fair to say, you don't know?

0174

1 A. Yes.

2 Q. Do you have an estimate as to when EDI will be

3 implemented?

4 A. No, I don't. There's other people who are paid

5 to do that stuff.

6 Q. Also, EDI is the data format which would then be

7 sent along either NDM, or what is termed on the -- I am

8 going to list off a few things, Gateway, electronic

9 bonding, or application to application, are those last

10 terms all synonymous?

11 A. I would say that the terms have a high degree of

12 synonymy to them, if that's a word. Is that a word?

13 MR. PUDDY: I don't know.

14 THE WITNESS: Gateway, EDI, and electronic

15 bonding, I think, are interchangeable.

16 MR. HARRIS: Q. Gateway and EDI are

17 interchangeable?

18 A. Generically, as to how they are used within

19 Pacific Bell.

20 Q. Okay. So if I ask you when will the Gateway be

21 available, you would say the same answer you provided to
22 me when I asked when EDI will be available?

23 A. Yes.

24 Q. Would an estimate of August 1997 be realistic,

25 or do you have no opinion?

0175

1 A. That is one of the planning dates that I have
2 heard, yes.

3 Q. Is that an ambitious estimate?

4 A. I don't know. I don't do systems development in
5 this particular job so I really couldn't tell you.

6 Q. In the development of the Gateway, will Pac Bell
7 need to work closely with the CLEC's?

8 A. Yes.

9 Q. And would Pacific Bell be receptive to a CLEC
10 like Brooks offering to begin testing as soon as possible
11 in the development of the Gateway?

12 MR. KOLTO-WININGER: Object to lacking
13 foundation. But go ahead and answer.

14 THE WITNESS: I am not the right person to ask
15 that question. I would ask the systems development
16 department for that.

17 MR. HARRIS: Q. With regard to the 5/31/97
18 release, you had mentioned previously that the
19 flow-through capability is largely responsible for the
20 anticipated crossover date of October 27; is that correct?

21 A. I said it's an important part of that. I didn't
22 say it was largely responsible for it.

23 Q. Fair enough. And you mentioned that noncomplex
24 services will have a flow-through capability at that time
25 or at the May 31st release; is that correct?

0176

1 A. That's correct.

2 Q. How would you define noncomplex services?

3 A. It's defined by the actual product set that's on
4 the customers service line, so examples of complex
5 products would be Centrex, ISDN, hunting. Those would be
6 probably the three most predominant that I can think of
7 that you could probably associate with.

8 Q. As complex?

9 A. Yes.

10 Q. So at this time, if I understand correctly from
11 one of the data requests responses, PBSM or Pac Bell
12 service manager is used to provide access to the CLEC's,
13 to information on ISDN and Centrex; is that correct?

14 A. It provides some information, yes.

15 Q. The PBSM will not have the flow-through
16 capability as of May 31st; is that correct?

17 A. That is correct.

18 Q. However, the RMI will have flow-through
19 capability; is that correct?

20 A. For noncomplex products and services.

21 Q. Right. Thank you. With regard to parity, you
22 had stated, rather poetically, you said issues of parity
23 make up the fabric of our everyday discussions, referring
24 to your conversations with other people at Pacific Bell.

25 In that context, how do you define parity?

0177

1 MR. KOLTO-WININGER: I am objecting to the
2 extent it calls for a legal conclusion. You go ahead and
3 give your understanding.

4 THE WITNESS: Parity is defined in our
5 contracts, and I define it by the verbiage in the
6 contract, that's probably a paragraph long, that I don't
7 believe I can restate here.

8 MR. HARRIS: Q. Perhaps you can give the gist
9 or paraphrase it.

10 A. From a pragmatic implementation perspective, no
11 CLC receives services or capabilities that are any worse
12 or better than what we provide to our retail customers in
13 our retail segment.

14 Q. Does that also encompass the ordering and
15 pre-ordering process?

16 A. Yes.

17 Q. Do the CLEC's have parity with Pacific Bell
18 today?

19 A. No.

20 Q. Will they, after the May 31st release?

21 MR. KOLTO-WININGER: Objection to the extent it
22 calls for a legal conclusion, but go ahead and give your
23 answer.

24 THE WITNESS: I don't know the answer to that.

25 There are so many areas and so many different

0178

1 interpretations as to what has to be in parity, that
2 without going through kind of a line-by-line assessment of

3 that, I don't know that I'd give you an absolute answer
4 one way or another. There's pre-ordering issues, there's
5 ordering issues, how I define it versus how you define it.

6 MR. HARRIS: Q. Let's limit it to the context
7 of ordering. In the ordering for ISDN services, there is
8 parity within Pacific Bell's retail and the resale
9 portions?

10 MR. KOLTO-WININGER: Same objection. Go ahead.

11 MR. HARRIS: Q. And this is after the May 31st
12 release.

13 A. Yes, there could be.

14 Q. And this is in light of your previous statement,
15 that there will be no flow-through capability for ISDN
16 ordering at the time of the May 31st release?

17 A. I understand -- ISDN does not flow through in
18 our retail business today.

19 Q. Does Centrex?

20 A. No, it does not.

21 Q. Do any services covered -- excuse me, sent
22 through the PBSM format have flow-through capability to
23 Pacific Bell's retail services?

24 A. The two that I'm familiar with are Centrex and
25 ISDN. I don't know if there's another product and certain
0179

1 services sent through PBSN that I am not aware of -- that
2 I am unaware of.

3 Q. If I recall, you also testified that examples of
4 complex services, which will not have flow-through
5 capability after the May 31st release, will be hunting; is

6 that correct?

7 A. That's correct.

8 Q. Does Pacific Bell, on its retail side, have
9 flow-through capability on that feature?

10 A. Some less complex hunt groups flow through but
11 in the definition of parity, the question would be, could
12 we provision a hunting service as quickly as we provision
13 it within other core business or retail business.

14 Q. My question dealt with whether there was
15 flow-through capability specifically, not the time period.
16 So is my understanding correct, that some hunting group
17 features on Pacific Bell's retail side would have
18 flow-through capability?

19 A. That's correct.

20 Q. Whereas, all hunting group features for resale
21 do not have flow-through capability?

22 A. That is correct, but as you define -- as we got
23 into a discussion of parity earlier, that does not
24 necessarily mean that they are not in parity.

25 Q. That's correct. Would you agree that without
0180

1 flow-through capability there is a need for human
2 intervention in the ordering process, on behalf of Pacific
3 Bell?

4 A. Yes.

5 Q. On the part of Pacific Bell, excuse me?

6 A. Yes.

7 Q. And with the increased need for human

8 intervention, is there not also increased potential for
9 human error?

10 A. As compared to?

11 Q. Automated flow-through capability where no human
12 intervention is required.

13 A. By general practice, I would say that a
14 generalization of machine-to-machine is less error prone
15 than human-to-machine.

16 Q. I have just a few clean-up questions that will
17 probably take a very short period of time.

18 I believe you stated that you began your
19 position as vice president of resale operations on or
20 about January 16th, 1997?

21 A. That's correct.

22 Q. Do you know the date when Jerry Sinn ended his
23 responsibilities for the resale portion of the LISC?

24 A. From a straight perspective, January 15th, 1997.

25 Q. So there was a clean cutover, no overlap?
0181

1 A. In terms of how we do organizational
2 announcements, yes. Did Jerry suddenly say, you are on
3 your own, buddy, and we didn't collaborate and work
4 through things, no.

5 Q. Also, I believe you stated that Leslie Wood is
6 responsible for the 2.5 and 2.0 releases of RMI; is that
7 correct?

8 A. I stated that she was responsible for developing
9 the user requirements for RMI-1.5 and 3.0.

10 Q. Thank you for the clarification. Were there

11 dates associated with those releases, 1.5 and 3.0, that

12 you could identify?

13 A. The one point -- the RMI-1.5 release was

14 commonly known as the March release, and the date in March

15 had been assumed to be during the first week of March,

16 originally. I can't recall the exact date. And the 3.0

17 release is normally referred to as the May release or May

18 31st.

19 Q. Also, prior to accepting the position as VP,

20 resale operations, you said you were executive director of

21 systems development and customer service; is that correct?

22 A. That's correct.

23 Q. Did you have any responsibilities in the

24 provisioning of ISDN in that capacity?

25 A. We did planning work on provisioning of ISDN

0182

1 services on the hybrid-fiber CLEC's network.

2 Q. I don't understand what you mean by planning.

3 Could you please explain?

4 A. We do not currently commercially sell ISDN

5 services on the HFC network, but we were in the planning

6 mode of doing the development to be able to do that.

7 Q. Did you have any customer service issues related

8 to ISDN services offered by Pacific Bell?

9 A. I don't know how to answer that question, it's a

10 little vague. Can I say that?

11 Q. Sure. You know what? I can move along on that

12 one, so don't worry about it.

13 You mentioned also that, I believe, the first
14 week of your new position in January this year, you met
15 with several individuals, your subordinates, in part to
16 get up to speed on what was happening in the resale LISC;
17 is that correct?

18 A. I think I said the first week-and-a-half and
19 indicated that one of the meetings probably took place
20 after that week-and-a-half, but yes, I met with them to
21 get up to speed.

22 Q. Did you take notes during those meetings?

23 A. Only what I would normally take in my little
24 spiral notebook.

25 Q. So those are gone?

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1 A. Yes, those are gone.

2 Q. At any time, did you request any of your
3 subordinates to write you a memo explaining what sort of
4 issues were being presented at the LISC, in an effort to
5 help bring you up to speed as quickly as possible?

6 A. I don't find written interchange to be the most
7 effective way to get a large amount of information
8 quickly, which is the mode I am in. I have had memos
9 written to me, but I have not requested anybody to write
10 me a memo describing the state of affairs in the LISC.

11 Q. And which specific memos do you recall having
12 been written to you?

13 A. As I mentioned to you, I get probably five to
14 six customer escalations or issues a week that I require
15 written feedback on from folks, in order to respond to

16 those.

17 Q. Anything specific to the systems employed by the
18 LISC rather than individual complaints?

19 A. No. I would -- the realm of my responsibility
20 on the systems side would be implementation of what we
21 receive from the technology services group. The internal
22 communications and the development of systems would be
23 largely within the systems development community.

24 MR. HARRIS: I don't have anything further.

25 MR. PUDDY: It's 25 to 5:00. We are not going
0184

1 to be able to finish today. Rather than picking this up
2 and dropping it again with my questioning, I would suggest
3 that the parties get a jump start on the traffic and we
4 begin at 1:00 o'clock on the 16th.

5 MR. KOLTO-WININGER: My preference would be to
6 use the time and to use it up now, and I guess if you are
7 fine with that --

8 THE REPORTER: I need to take a break.

9 MR. KOLTO-WININGER: Okay.

10 (Recess taken.)

11

12 FURTHER EXAMINATION BY MR. PUDDY

13 MR. PUDDY: Q. Take a look at Exhibit 4. For
14 the record, Exhibit 4 is a December 4, 1996, copy of a
15 letter from Jerry Sinn to Mary Ann Collier. Have you seen
16 that before?

17 A. No.

18 Q. Did you learn through any source that, as of
19 early December 1996, LISC capacity was approximately 400
20 orders per day but that Pacific was projecting that it
21 would achieve a capacity of 2000 orders per day by the end
22 of January 1997?

23 A. I think it's a two-part question. I mentioned
24 earlier that I was aware that there was a 2000 orders per
25 day bogee at the end of January, shortly after my arrival.
0185
1 I probably had data that came across my desk where I could
2 have figured out that it was 400, but I don't know that
3 that specifically sticks in my mind.

4 Q. In your discussions with Mr. Sinn, did you have
5 any discussions concerning the reasons that Pacific -- did
6 Pacific meet its goal of establishing a capacity of 2000
7 orders per day by the end of January 1997?

8 A. Based on the data I have available to me, no.

9 Q. Had you had any discussions with Mr. Sinn or
10 anyone wherein you were advised of the reasons for
11 Pacific's failure to achieve that goal?

12 A. I believe the answer to that is yes, yes.

13 Q. What were the reasons?

14 A. I believe one of the majors reasons was, as we
15 went and built, got experience in developing the
16 processes, working through the issues, one of the major
17 assumptions that was incorrect was the processing time per
18 order, that we had assumptions on what that was going to
19 look like, that were more or less than were actually
20 occurring in the operating environment. That was a major

21 one that I remember us specifically discussing.

22 Q. What presumptions concerning operational time

23 per order were used in generating the prediction that

24 Pacific could achieve a 2000 order per day capacity by the

25 end of January 1997?

0186

1 MR. KOLTO-WININGER: If you know.

2 THE WITNESS: I don't know what the specific

3 number was, nor have I reviewed the model.

4 MR. PUDDY: Q. In terms of your discussions

5 with Mr. Sinn about the discrepancy between -- withdraw

6 that. My note taking once again fell behind.

7 The principal discrepancy was the operational

8 what?

9 A. The principal discrepancy was the amount of time

10 it took to process a particular order type.

11 Q. And what were the two ends of that discrepancy?

12 What was the presumption and what was the actual?

13 A. I don't know what his presumption was when he

14 made the estimate. I can tell you that our actual time,

15 during the January time frame, was running, for this

16 particular order type, about 75 minutes.

17 Q. And Mr. Sinn didn't indicate to you the degree

18 by which he was off, in terms of his projection as opposed

19 to the actual?

20 A. I don't precisely remember him stating that. I

21 remember the order of magnitude may have been in the area

22 of about two times.

23 Q. Which was to say it was taking about twice as
24 long as he thought?

25 A. That's correct.

0187

1 Q. Take a look at Exhibit No. 6, please. We
2 referenced this earlier today.

3 This is the December 13, 1996, letter from
4 Thomas Moulton to Reed Hundt. Have you seen this letter
5 before?

6 A. Yes.

7 Q. In this December 13 letter, Pacific communicated
8 to Reed Hundt, chairman of the FCC, with carbon copies to
9 Commissioner Chong, Ness, Quello and others that --

10 MR. KOLTO-WININGER: Do you have any real
11 questions here?

12 MR. PUDDY: Q. -- Pacific anticipated achieving
13 a capacity of 4000 orders a day by the end of January
14 1997. Did you have any discussions with anyone concerning
15 the changes in the model or employee assumptions, or
16 whatever, in the intervening week between this letter and
17 the last letter, that caused Pacific's projection of its
18 capacity as of end of January 1997 to double?

19 MR. KOLTO-WININGER: Objection. Lacks
20 foundation, but if you know.

21 THE WITNESS: No. The discussion that I just
22 recounted to you in your previous question was the general
23 discussion we had on capacity that was relevant to both
24 situations.

25 MR. PUDDY: Q. Have you learned from any source

0188

1 of any input into the model for capacity projection that
2 could have caused Pacific to achieve a projection of twice
3 its former projection?

4 MR. KOLTO-WININGER: Objection. Lacks
5 foundation.

6 THE WITNESS: I don't know what was in the
7 model. I'm sorry.

8 MR. KOLTO-WININGER: Go ahead.

9 THE WITNESS: I don't know. I don't know what
10 was in the model.

11 MR. PUDDY: How could it possibly lack
12 foundation if I am asking if he has any information?

13 MR. KOLTO-WININGER: I made my objection.

14 MR. PUDDY: And my complaint is that --

15 MR. KOLTO-WININGER: I am going to adjourn the
16 deposition if you pursue this line.

17 MR. PUDDY: If I complain that you are
18 interfering with my discovery?

19 MR. KOLTO-WININGER: I am going to adjourn the
20 deposition. Obviously, you don't have any line to follow
21 up here. You are trying to fish for questions to ask and
22 so I am going to adjourn the deposition.

23 MR. PUDDY: I have a line of questioning to
24 follow.

25 MR. KOLTO-WININGER: You are asking about
0189

1 documents that he has no idea what the underlying
2 assumptions are, and you are trying to string along the

3 deposition so that you can get to another day. Ask your
4 question.

5 MR. PUDDY: No, no, no, no.

6 It's 10 to 5:00. In light of the tone of the
7 conversation, and the fact that I am tired, I am going to
8 adjourn the deposition.

9 MR. KOLTO-WININGER: We are ready to keep going.
10 If you don't want to use this time, then that's it. The
11 deposition is over.

12 MR. PUDDY: Q. Exhibit No. 8 is a copy of
13 Pacific Bell's response to MCI's first set of data
14 requests. I have provided a copy to the witness.

15 Did you participate in the preparation of the
16 answers to any of the requests in these responses?

17 A. Excuse me for being vague in my answer. I
18 probably did, but there have been so many data requests,
19 to be honest with you, I don't know precisely which
20 questions.

21 Q. Could you take a look through them, please, and
22 see if you can identify which of the requests you may have
23 provided responses to? There are several.

24 A. Maybe could I ask if there are particular ones
25 that you are interested in that I can answer for you?
0190

1 Q. I have questions about a number of them, and I
2 will have to go through them seriatim to identify the ones
3 that -- take your time. We have 10 minutes.

4 MR. KOLTO-WININGER: There are 135 data
5 requests, so it's overly broad and burdensome. If you

6 have questions about particular ones, why don't you ask
7 the witness.

8 While you look through the document, I would
9 suggest that if you have other questions that you go ahead
10 and ask those questions now, because I am going to object
11 to the resumption of the deposition.

12 MR. PUDDY: Counsel, you object that I don't
13 have an established train of thought. In response to the
14 request of co-counsel on this side of the case, I
15 interrupted my questioning a couple of hours ago.

16 It's the end of the day. I'm tired, and to walk
17 back in is difficult. In terms of going back to where I
18 was two hours ago and re-establishing my train of thought,
19 is not something that I can accomplish.

20 MR. KOLTO-WININGER: I am not sure that it was
21 done for our benefit. First of all, I believe it was done
22 for our adversary's benefit, and in that regard, I don't
23 think it's to Mr. Stankey's benefit to have to take
24 another day off work to come back for deposition.

25 Do you have general areas of questioning that
0191
1 you still want to cover, that you know the subject matter?
2 Are there any particular areas you can identify that you
3 haven't covered with this witness?

4 MR. PUDDY: Counsel, I am too tired for this. I
5 am afraid that we are just going to get in a big fight
6 here and it's just not worth it.

7 Mr. Stankey, it's been a pleasure meeting you.

8 I look forward to seeing you again next Wednesday, and

9 let's stop that exercise.

10 THE WITNESS: You want that back?

11 MR. PUDDY: I will endeavor to focus my

12 questioning on specific interrogatories in advance when we

13 get together next Wednesday.

14 THE WITNESS: Okay.

15

16 (Whereupon, the proceedings were adjourned

17 at 4:56 p.m.)

18

19 --- o0o ---

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1 CERTIFICATE OF WITNESS

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3

4

5 I, the undersigned, declare under penalty of

6 perjury that I have read the foregoing transcript, and I

7 have made any corrections, additions, or deletions that I

8 was desirous of making; that the foregoing is a true and

9 correct transcript of my testimony contained therein.

10

11 EXECUTED this day of ,

12 19 , at ,

13

14

15 -----

16 JOHN T. STANKEY

17

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1)

2 STATE OF CALIFORNIA) ss.

3)

4 I, SANDRA L. CARRANZA, the undersigned, a Certified

5 Shorthand Reporter of the State of California, hereby

6 certify that the witness in the foregoing deposition was

7 by me duly sworn to testify to the truth, the whole truth,

8 and nothing but the truth in the within-entitled cause;

9 that said deposition was taken at the time and place

10 therein stated; that the testimony of said witness was

11 reported by me, a Certified Shorthand Reporter, and a

12 disinterested person, and was thereafter transcribed under

13 my direction into typewriting; that the foregoing is a

14 full, complete, and true record of said testimony.

15 I further certify that I am not of counsel or

16 attorney for either or any of the parties in the foregoing

17 deposition and caption named, or in any way interested in

18 the outcome of the cause named in said caption.

19 IN WITNESS WHEREOF, I have hereunto set my hand this

20 day of , 1997.

21 -----
22 SANDRA L. CARRANZA
23 Certified Shorthand Reporter
24 Registered Professional Reporter

25
0194
1 CHAMBERLIN & ASSOCIATES
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3 Two Embarcadero Center, Suite 1710
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5 4/14/97

6 TO: JOHN T. STANKEY
7 PILLSBURY, MADISON & SUTRO
8 c/o ED KOLTO-WININGER, ATTORNEY AT LAW
9 235 Montgomery Street
10 San Francisco, California 94104

11 RE: MCI TELECOMMUNICATIONS CORPORATION vs. PACIFIC
12 BELL AND PACIFIC BELL COMMUNICATIONS
13 Date of Deposition: April 8, 1997, Vol. I
14 Reported By: SANDRA L. CARRANZA, CSR 7062

15 JOHN T. STANKEY:

16 The original transcript of your deposition taken in
17 the above-entitled action has been prepared and is
18 available at this office for your reading, correcting, and
19 signing.

20 You may wish to discuss this matter with your
21 attorney to determine if counsel requires that the
22 original transcript of your deposition be read, corrected,
23 and signed by you before it is sealed.

16 Your rights regarding signature of this deposition
are contained in the California Code of Civil Procedure.

17
Unless otherwise directed, your original deposition
18 transcript will be sealed after 35 days from today's date.

19 If you wish to make arrangements to review the
original transcript of your deposition, please contact
20 this office during office hours, 9:00 to 5:00 Monday
through Friday, to make an appointment to review the
21 original transcript.

22 Sincerely,

23 SANDRA L. CARRANZA
Certified Shorthand Reporter
24 Registered Professional Reporter

25 cc: All Counsel
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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF GEORGIA

In the matter of:

Consideration of BellSouth Telecommunications,
Inc.'s Entry into InterLATA Services Pursuant
Section 271 of the Telecommunications Act of 1996)
DOCKET
NO. 6863-U

PREFILED DIRECT TESTIMONY OF
JULIA STROW
ON BEHALF OF INTERMEDIA COMMUNICATIONS INC.
FEBRUARY 13, 1997

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1 BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
2 OF THE STATE OF GEORGIA

3
4 DIRECT TESTIMONY OF
5 JULIA STROW

6
7 DOCKET NO. 68-63-U

8
9 FEBRUARY 13, 1997

10
11 Q: PLEASE STATE YOUR NAME, EMPLOYER, POSITION, AND BUSINESS
12 ADDRESS.

13

14 A: My name is Julia Strow. I am employed by Intermedia
15 Communications Inc. ("Intermedia") as Director, Strategic
16 Planning and Regulatory Policy. My business address is 3625
17 Queen Palm Drive, Tampa, Florida 33619.

18

19 Q: WHAT ARE YOUR RESPONSIBILITIES IN THAT POSITION?

20

21 A: I am the primary interface between Intermedia and the
22 incumbent local exchange CARRIERS ("ILECs"). In that
23 capacity, I am involved in interconnection negotiations and
24 arbitrations between Intermedia and the ILECs. I also
25 participate generally in strategic planning and the setting
26 of Intermedia's regulatory policy.

27

28 Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL
29 EXPERIENCE.

30

31 A: I graduated from University of Texas in 1981 with a B.S. in
32 Communications. I joined BellSouth in 1983 as a Sales
33 Account Executive responsible for major market accounts. I

1 subsequently held various positions in BellSouth's Marketing
2 Department, with responsibilities for Billing and Collection
3 and Toll Fraud Services. In 1987, I was promoted to Product
4 Manager for Billing Analysis Services, with responsibility
5 for the development and management of BellSouth's toll fraud
6 detection and deterrence products. In 1988, I was promoted
7 into the BellSouth Federal Regulatory organization. During
8 my tenure there, I had responsibility for regulatory policy
9 development for various issues associated with Billing and
10 Collection Services, Access Services and Interconnection.
11 In 1991 and due to a restructuring of the Regulatory
12 organization, my role was expanded to include development of
13 state and federal policy for the issues I mentioned above.
14 During my last two years in that organization, I supported
15 regulatory policy development for local competition,
16 interconnection, unbundling, and resale issues for
17 BellSouth. I joined Intermedia in April 1996 as Director of
18 Strategic Planning and Regulatory Policy.

19

20

INTRODUCTION

21

22 Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

23

24 A: The purpose of my testimony today is to provide the Georgia
25 Public Service Commission (the "Commission") with
26 information concerning the status of local competition in
27 the state of Georgia. I understand that the Commission
28 seeks comments and information to form an evidentiary basis